

REMARKS

Acceptance and formal entry therefor of this responsive Amendment is respectfully requested. Moreover, reconsideration and withdrawal of the outstanding art rejection, in consideration of this filing, is respectfully requested.

The originally submitted Specification was revised to correct numerous informalities noted therein as well as to improve the readability thereof. Due to the extensiveness of the revisions implemented therein, applicants, through their undersigned representative, are submitting herewith (**as Attachment A**) a Substitute Specification directed thereto. It is submitted, new matter is not being added with regard to the Substitute Specification, either by addition and/or deletion. Also, since the accompanying Substitute Specification is a voluntary submission by applicants, enclosed herewith, also, is a marked-up version of the originally filed Specification showing changes made (**see Attachment B**). Acceptance therefor of this Substitute Specification as a replacement of the originally submitted Specification is respectfully requested.

Acceptance of the two (2) replacement sheets of drawings which include corrective revisions to Figs. 2 and 6, is also respectfully requested. The changes being made to Figs. 2 and 6, it is submitted, are of a minor formal nature including to correct discovered informalities therein. The drawing changes made are discussed in detail in the above set forth amendments to the drawings and can be seen with regard to the accompanying annotated sheets directed thereto. Since these

revisions correct minor informalities, acceptance of the two replacement sheets of drawings is respectfully requested.

Claims 1 and 4-9 are pending of which claims 1, 4, 5 and 7-9 are currently amended. Revisions implemented in the claims are in consideration of effecting further clarification of the claimed subject matter including in a manner which highlights various originally disclosed aspects thereof including to highlight various distinguishing aspects thereof over that previously known including over the art documents, as cited in the outstanding rejection.

Claims 1 and 4-9 stand rejected under 35 USC §103(a) over the combination of King et al (USP 5,953,541) in view of Walker (USP 6,528,741). As will be shown, hereinbelow, the invention according to these claims, as currently amended, could not have been rendered obvious over the combined teachings of the above-named art documents, in the manner as that alleged in the outstanding rejection. Therefore, insofar as presently applicable, this rejection is traversed and reconsideration and withdrawal of the same is respectfully requested.

King et al, it is submitted, disclosed a system for inputting information using the commonly known T9® predictive word input scheme, which is also referred to in the background section of the present Specification (see page 1, line 21). That is, King et al's disclosure combines prior conventional schemes with other non-relevant details such as how to accept a word that is inputted using a word prediction scheme with a use of more advanced inputting means such as touch screens to input text. In King et al textual entry keystrokes are ambiguous. The user strikes a delimiting

"Select" key at the end of each word, delimiting the keystroke sequence that could match any of many words with the same number of letters. The keystroke sequence is processed with a complete vocabulary, and words that match the sequence of keystrokes are presented to the user in the order of decreasing frequency of use. Further, stems of longer words whose initial letters match the sequence of keystrokes are also presented to the user in order of decreasing frequency of use.

Walker disclosed a portable electronic device that has a keypad for entering alphanumeric characters including a plurality of single contact keys (e.g., 2) and a multi-way shift key (e.g., 3). A character is entered by actuating a single contact key alone or in combination with the multi-way shift key. The multi-way shift key may be a four-way rocker switch with each single contact key having five character labels, four of which are arranged to indicate the direction in which the rocker switch should be actuated to enter the corresponding character, the rocker switch relating to the "first key numeral 3" which is simply a navigation key having the directions up, down, left and right.

According to Walker's text entry scheme, the one-switch keys (or single contact keys 2) on the keypad all have a number of characters assigned to them, respectively, namely, one primary character (i.e., default character) located in the middle of the key and four secondary characters that are shown on the lower and upper as well as the left and right edges of the key. The multi-switch key (or multi-way shift key 3) is used to navigate the selection of one of the characters associated with a one-switch key (or single contact key). Walker describes choosing a primary

character by pressing the associated single contact key 2 once and choosing a secondary character by pressing the associated single contact key 2 and simultaneously pressing the multi-switch key in one of the four navigation directions, consistent with the location of the secondary character on the associated single contact key 2.

It is submitted, Walker taught a scheme for inputting data which requires a complex input means (e.g., a multi-way shift key 3) and a method requiring two hands to be operable. From the discussion in column 2, lines 1-12 and lines 16-26, in Walker, a simple pressing action of a one-switch key 2 inputs the primary character of that key (which is displayed in the middle of the key) and a combination of a pressing action of a one-way switch 2 and a multi-way switch key 3 in one of the four navigational directions inputs the character associated with the one-switch key 2 that is displayed in a like location on that key. Also, based on Walker's discussion, in column 2, lines 27-31 thereof, a character on a one-switch key 2 is accepted by releasing that one switch key 2 first and is canceled by releasing of the multi-way shift key 3 first. From the discussion in column 2, lines 42-47, in Walker et al, it is required that both the single contact key 2 and the multi-way shift key 3 be depressed at the same time to effect the inputting of a non-primary character of that single contact key 2.

Walker states that the user may accept a character of an alphanumeric key by releasing the associated one-switch key 2 first and the user may de-select the associated character by, instead, releasing the multi-way shift key 3 first. In other

words, Walker's method and apparatus is directed to a text entry application on a portable device which requires the user to use both hands (see column 2, lines 56-63). That is, Walker taught a system for inputting data which requires a relatively complex input means (e.g., a multi-way shift key) and the method employed by the user necessarily requires the use of both hands to operate the system.

It is submitted, Walker's method would be quite clumsy to use in that it requires both hands to work simultaneously when it is desired to input a character other than a default character of an alphanumeric key. For example, the requirement to use both hands simultaneously according to Walker's method could be difficult in crowded surroundings or under moving surroundings such as traveling on a train or when carrying a load in one hand. Further, it could become quite tiring and could readily lead to errors and timewasting to employ a method such as that taught by Walker noting that such method requires a decision to be made (by the user) of which key to release first, noting that the releasing of one key first would lead to acceptance of an input while the releasing of the other key would lead to the de-selection of the associated character.

As now set forth in each of the independent claims 1, 5 and 7, the scrolling operation is effected by another key following the keystroke action associated with a character entry alphanumeric key. According to the present invention, the scrolling is effected by pressing a special scrolling key (see claim 1) which only in some instances, namely, during an editor mode, is used as a scrolling key and is most preferably the same scrolling key as used in a predictive text editor (see claims 5

and 7). The scroll key may also be another alphanumeric key that is dedicated to be a scroll key when the phone is in an "editor mode". An alphanumeric key, according to the present invention, it should be understood, also may include the "*" key as well as the "#" key that are normally found, for example, in a twelve key ITU-T keypad.

Table 1 also shows an example of twelve alphanumeric keys of a phone keyboard.

Examples of methods of entering individual characters as well as words and other such text strings of characters as that presently set forth are illustrated in connection with the discussion on page 8, line 18 *et seq.* of the original Specification (including Table 3), page 9, line 12 *et seq.* and Fig. 5 of the drawings and page 11, line 5 *et seq.* and Fig. 6 of the drawings. For example, in order to select a character from the group of characters of an alphanumeric key that is not a default character of that key, a scroll key is pressed following the pressing action of a character entry numerical key. This is the case in connection with each of the independent claims, as that now set forth. Such a scheme would clearly permit the use of a single hand by the phone user to effect selection of a string of characters in connection with the inputting of a text string such as in connection with a text messaging application. It is submitted, such could not be implemented from the teachings of King et al and Walker, even if they are employed combinedly.

With regard to amended dependent claim 4, the selection of the appointed character according to claim 1 is effected by providing a new alphanumeric keystroke for selecting a character group containing the next character of the text string or by pressing a space key (see also claim 9). An example of this is given with

regard to implementation of the term "Lund" with regard to the text string sequence shown in Fig. 5 of the drawings (see page 10, lines 24-27, and page 11, lines 10-14, of the original Specification along with Figs. 5 and 6). That is, upon performing a scrolling operation, selection may be effected by simply providing a new alphanumeric keystroke for selecting the next character of the text string or, for that matter, by pressing a space key such as key 67 in Fig. 1. The use of the same scrolling key for both editors such as set forth with regard to claims 7+, an example of which is described with regard to the flow chart in Fig. 6 of the drawings, was not taught even over the combined teachings of King et al and Walker. The present invention, as stated earlier, can also be implemented with only one hand and thus be quite useful in both situations such as crowded spaces or when carrying bags and would also be easily adaptable for physically challenged persons who might only be able to use one hand or, for that matter, a single digit with dexterity.

It is submitted, a scheme such as that called for according to claims 1+, 5+ and 7+, as that now amended, could not have been realizable even over the combined teachings of King et al and Walker, such as applied in the outstanding rejection. The combination of King and Walker, it is submitted, would produce a device with text input using a predictive engine and having groups of characters assigned to each key. The text input, when not using the predictive engine, would require using the complex multi-way shift key (navigation key) to select one of the non-default characters assigned to a specific key and this navigation key would be used differently depending on the types of modes being implemented. This

difference would be confusing and most certainly difficult to learn for a user as there are already many functions attached to each key (of King et al) which many users, applicants submit, would find quite troublesome.

On the other hand, the present invention employs a scheme in which the character can be selected by simply continuing the typing application as the selection is performed by starting the inputting of the next character by pressing the associated alphanumeric key directed thereto followed by the scrolling action thereof (if the next character is not a default character of that next character entry alphanumeric key). Such, it is submitted, could not have been realizable even over the combined teachings of King et al and Walker.

In view of the clarifying amendments presented hereinabove, together with these accompanying remarks, which, applicants believe, renders the application allowable, acceptance and formal entry therefor of this amendment and early allowance of the above-identified application is respectfully requested.

If the Examiner deems that questions and/or issues still remain which would prevent the present application from being allowed at the present time, he is urgently invited to telephone the undersigned representative, at the number indicated below, so that either a telephone or personal interview may be arranged at the Examiner's convenience in order to discuss the same and hopefully resolve any remaining questions/issues present.

To the extent necessary, Applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of

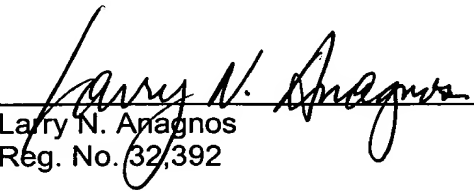
U.S. Application No. 09/921,127

1030.40414X00

this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of Antonelli, Terry, Stout & Kraus, LLP, Deposit Account No.

01-2135 (referencing docket no. 1030.40414X00).

Respectfully submitted,
ANTONELLI, TERRY, STOUT & KRAUS, LLP



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AMENDMENT TO THE DRAWINGS

The attached two (2) replacement sheets of drawings include changes to Figs. 2 and 6 thereof. With regard to Fig. 2, the inadvertently omitted outlines of the blocks corresponding to the processor 18 and digital signal processing unit 14 are being appropriately illustrated. The blocks for the processor 18 and unit 14, as now shown by the formal amendments made to Fig. 2, are consistent with the related discussion directed thereto on page 4, line 24 *et seq.* of the original Specification. With regard to Fig. 6 of the drawings, correction of the misspelled word "*character*", in two locations, is being effected. Also in Fig. 6, the expression "Press space and add word to text string **105**" is being corrected to the expression Press space key 67 and add word to text string 105. The latter revision is of a minor nature and is consistent with the related discussion on page 11, lines 26-27, of the original Specification.

Attachments:

- (1) Two (2) replacement sheets directed to Figs. 2 and 6 of the drawings.
- (2) Two (2) annotated sheets showing the changes made to Figs. 2 and 6 of the drawings.

Annotated Drawing Sheet

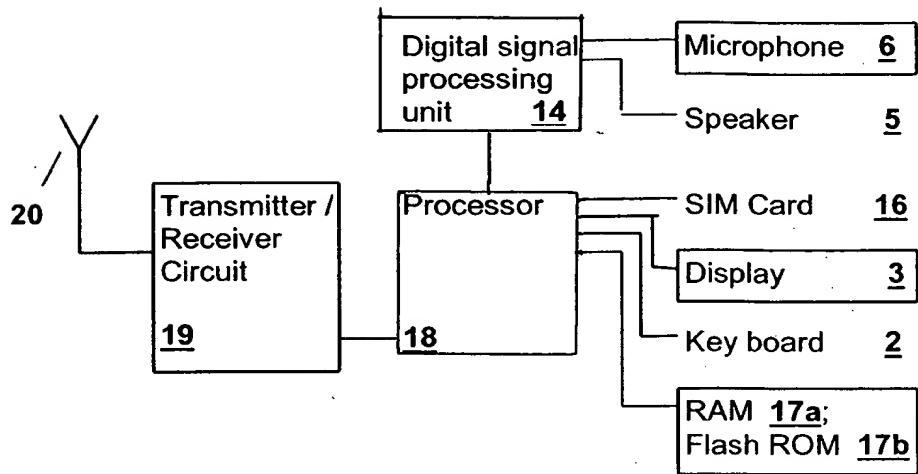


Fig. 2

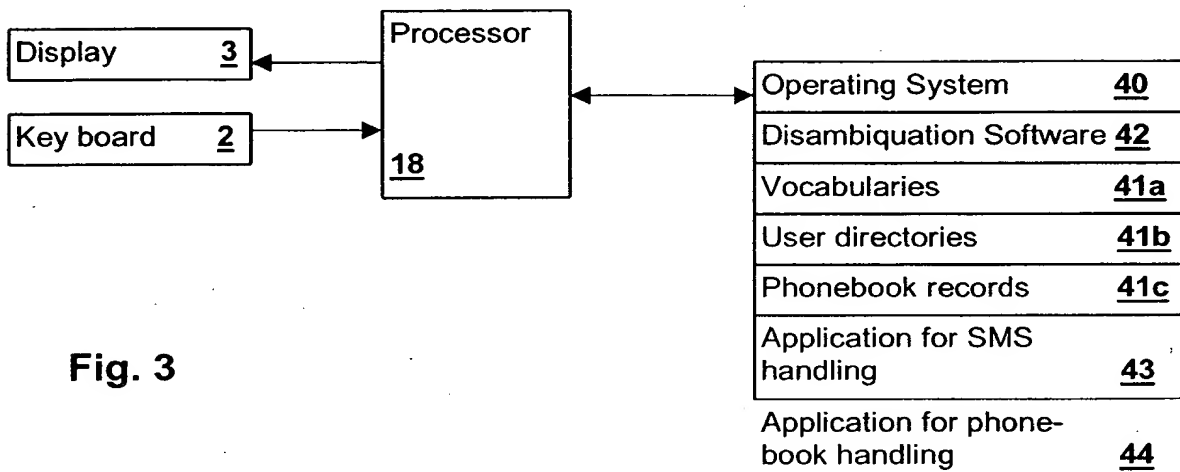


Fig. 3

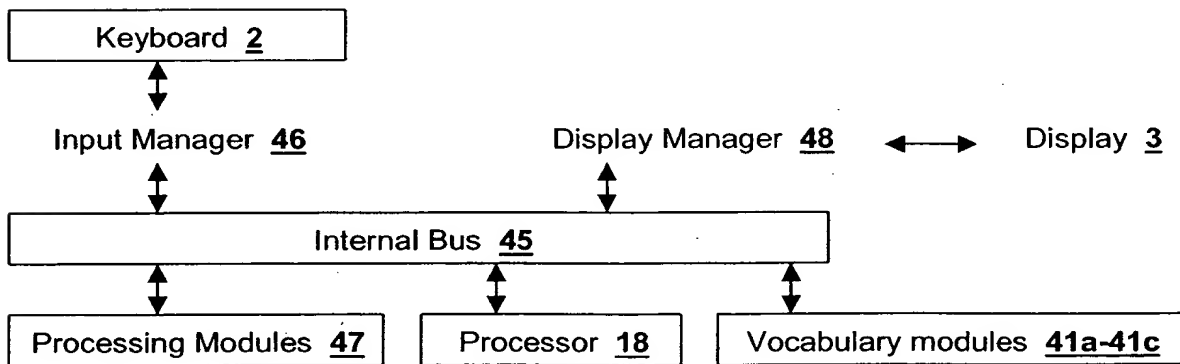


Fig. 4

Fig. 6

